

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

ANTONIO FERNANDEZ,

Plaintiff,

v.

CASE NO. 2:25-cv-53

ANNA ANIMAH RICHARD,

Defendant.

JOINT MOTION FOR EXTENSION OF TIME

Defendant Anna Animah Richard by counsel, and Plaintiff Antonino Fernandez, by counsel, hereby move this Honorable Court for an extension of time and respectfully ask this Court to stay Defendant's deadline for filing an answer or other responsive pleading. In support of this Motion, the parties state the following:

1. On February 2, 2025, Plaintiff filed his Complaint in this matter.
2. The Complaint was served on Defendant on February 10, 2025.
3. Defendant's responsive pleading is presently due March 3, 2025.
4. On February 12, 2025, the Office of the Attorney General of Virginia experienced a cyberattack that prevented counsel for Defendant from accessing all client files for approximately one week. Due to the difficulties created by the cyberattack, counsel for Defendant requires more time to file a responsive pleading.
5. For the foregoing reason, the parties respectfully request this Court stay the Defendant's deadline to file an answer or responsive pleading for fourteen (14) days to March 17, 2025.

Respectfully submitted,

ANNA ANIMAH RICHARD

By: s/ Mitchell E. Sanders
Mitchell E. Sanders, VSB #100764
Assistant Attorney General
Office of the Attorney General
Criminal Justice & Public Safety Division
202 North 9th Street
Richmond, Virginia 23219
(757) 910-3912
(804) 786-4239 (Fax)
Email: MSanders@oag.state.va.us
Counsel for Defendant

ANTONIO FERNANDEZ

By: s/ Danny Zemel
Danny Zemel
The Krudys Law Firm, PLC
919 East Main Street, Suite 2020
Richmond, VA 23219
(804) 774-7950
dzemel@krudys.com
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing ("NEF") to the following:

Danny Zemel
The Krudys Law Firm, PLC
919 East Main Street, Suite 2020
Richmond, VA 23219
(804) 774-7950
dzemel@krudys.com
Counsel for Plaintiff

s/ Mitchell E. Sanders
Mitchell E. Sanders, VSB #100764
Assistant Attorney General